

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: MICHAEL P. MOONEY AKA MICHAEL MOONEY AND MAUREEN G. MOONEY AKA MAUREEN MOONEY DEBTORS	BANKRUPTCY NO. 19-13032 CHAPTER 7
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NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

Debtors, **MICHAEL P MOONEY AKA MICHAEL MOONEY AND MAUREEN G. MOONEY AKA MAUREEN MOONEY**, have filed an Amended Motion to Avoid Lien of The Charles Haaf Trust, Anna Tercha, and Kate E.M. Tercha Pursuant to 11 U.S.C. § 522(f) in the above-captioned matter.

1. **Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney).

2. If you do not want the court to grant the relief sought in the Motion or if you want the court to consider your views on the Motion, **then on or before June 17, 2019** you or your attorney must file a response to the Motion. (*see Instructions on next page*).

3. A hearing on the Motion is scheduled to be held **on Thursday, July 3, 2019 at 9:30 a.m. before the Honorable Jean K. Fitzsimmons, United States Bankruptcy Court, The Madison Building, 400 Washington Street, Reading, PA 19601**. Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing.

4. If you do not file a response to the Motion, the court may cancel the hearing and enter an order granting the relief requested in the Motion.

5. You may contact the Bankruptcy Clerk's office at 610-208-5040 to find out whether the hearing has been canceled because no one filed a response.

6. If a copy of the motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of this Notice.

Filing Instructions

7. If you are required to file documents electronically by Local Bankruptcy Rule 5005-1, you must file your response electronically.

8. **If you are not required to file electronically**, you must file your response at

United States Bankruptcy Court
The Madison Building
400 Washington Street
Suite 301
Reading, PA 19601

9. **If you mail your response** to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the previous page of this Notice.

10. On the same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the movant's attorney:

Shawn J. Lau, Esquire
Lau & Associates, P.C.
4228 St. Lawrence Avenue
Reading, PA 19606
610-370-2000 Phone
610-370-0700 Fax
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Dated: June 3, 2019

/s/Shawn J. Lau
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